

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. No. 04-11024-RWZ

JEANNE DEGAN,)
Plaintiff)
v.)
GOLDWELL OF NEW)
ENGLAND, INC. and)
R.G. SHAKOUR, INC.,)
Defendants)

SECOND AFFIDAVIT OF JEANNE DEGEN

I, Jeanne Degen, under oath depose and state, on the basis of personal knowledge, the following:

1. I reside in Barrington, New Hampshire.
2. There is no public transportation in Barrington. The town is a spread-out community, and I must drive 2 to 3 miles to buy groceries.
3. Portsmouth, New Hampshire is the nearest city. There is no public transportation to Portsmouth. My health care providers are located in Portsmouth, and I drive approximately 30 minutes each way for my appointments with them.
4. Driving is of central importance to my daily life in New Hampshire.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY, on this

18 day of August, 2005


Jeanne Degen